PERSONAL PROTECTIVE EQUIPMENT

Program Element R2-10-207(10)(k)

Each agency loss prevention committee or individuals designated by the agency head shall develop, implement, and monitor the selection, use, and maintenance of personal protective equipment specific to the agency.

As outlined in the <u>NIOSH Hierarchy</u> of controls, when workplace chemical, physical, biological, or ergonomic hazards cannot be eliminated or cannot be controlled by using engineering and administrative controls, OSHA requires the use of personal protective equipment (PPE) for control of workplace hazards. **PPE should be the last control method considered**.

Personal protective equipment (PPE) requirements are included in many different OSHA standards for general industry and construction. OSHA 1910.132 outlines general program requirements and responsibilities for PPE hazard assessment, selection, training, use, maintenance and sanitation. Other OSHA standards include 1910.133 Eye and face protection; 1910.135 Head protection; 1910.136 Foot protection; 1910.137 Electrical protective equipment; and 1910.138 Hand protection. Regulations that cover the construction industry begin at 1926.95 (criteria for personal protective equipment).

Note: Much of the information below (identified in quotes) was provided by the OSHA document 3151-02R 2023, Personal Protective Equipment.

_			
\Box	fi n	:4:2	n.
110	тп		TI.

"Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to a variety of hazards. Examples of PPE include such items as gloves, foot and eye protection, protective hearing devices (earplugs, muffs), hard hats, respirators and full body suits."

The Personal Protective Equipment Program is a program that outlines the responsibilities of the employer to provide protection for workplace hazards that cannot be eliminated through substitution, engineering controls, or administrative controls.

Why do I need this program?

A PPE program element may be required as part of the agency's industrial hygiene program.

The purpose of the PPE program is to protect workers by assessing workplace hazards and providing protective equipment that controls exposure to occupational hazards. It is important to first use all other hazard control methods as the primary method for protecting employees.

However, when PPE is necessary, employers shall ensure that the correct PPE is provided and that the employees wear it as intended. How do I know if this program applies to my agency and my specific job hazards?

To determine the need for a PPE program, the agency must conduct a hazard assessment of each employee task and job site to determine if the program is applicable to the agency. The hazard assessment should result in a list of potential hazards in the following basic hazard categories:

- Fall hazards,
- Impact,
- Penetration,
- Compression (roll-over),
- Chemical,
- Heat/cold,
- Harmful dust, gas, or vapor,
- Light (optical) radiation,
- Biological,
- Noise.

Assess for potential hazards by reviewing the agency loss history of occupational illnesses and injuries. Hazards could include electricity, machine or tool motion, high temperature, chemicals, dusts, welding, falling material, sharp objects, and blood or other potentially infectious material.

When the assessment is complete, the agency should organize and analyze the data to determine if exposure to workplace hazards can be managed through elimination/substitution, engineering controls, or administrative controls. If these methods cannot be applied, or do not result in sufficient reduction of hazard, the proper types of PPE are required.

The workplace should be periodically reassessed for any changes in conditions, equipment or operating procedures that could affect occupational hazards. Also include a review of injury and illness records to identify trends or areas of concern, and take appropriate corrective action. The suitability of existing PPE, including an evaluation of its condition and age, should be included in the reassessment.

What are the minimum required elements and/ or best practices for a personal protective equipment program?

Guidelines and Criteria: Agencies that develop a PPE Program should include at least the following elements:

- A hazard assessment of the workplace to identify and control physical and health hazards
- Selection of the appropriate PPE, including proper fitting (fit testing)
- Education and training (refer to next section)
- Maintenance of PPE, e.g., cleaning, storage, and replacement
- Auditing the effectiveness of the PPE, e.g., shift in exposures, injury data, effectiveness of training, employee feedback, and observation.

The scope of a PPE program includes PPE for eye, face, head, foot, leg, and hand protection. If respirators and/or hearing protection are necessary, the organization's Respiratory Program and Hearing Conservation Program, respectively, will cover their use.

Are there any mandatory training requirements or best practices that should be developed by the agency?

"Employers are required to train each employee who must use PPE. Employees must be trained to know at least the following:

- How to identify the hazard.
- When PPE is necessary.
- What PPE is needed for the hazard.
- How to properly put on (don), take off (doff), adjust, and wear the PPE.
- The limitations of the PPE.
- Proper care, maintenance, useful life and disposal of PPE.

Employers should make sure that each employee demonstrates an understanding of the PPE training as well as the ability to properly wear and use PPE before they are allowed to perform work requiring the use of the PPE. If an employer believes that a previously trained employee is not demonstrating the proper understanding and skill level in the use of PPE, that employee should receive retraining. Other situations that require additional or retraining of employees include changes in the workplace or in the type of required PPE that make prior training obsolete"

Are there specific requirements for documenting the program, training, etc...?

"Documentation of the hazard assessment is required through a written certification that includes the following information:

- Identification of the workplace evaluated;
- Name of the person conducting the assessment;
- Date of the assessment; and
- Identification of the document certifying completion of the hazard assessment."

Additionally, the employer must document the training of each employee required to wear or use PPE. Documentation to include the name of each employee trained, the date of training, and a clear identification of the subject of the training.

Are there any resources available that can assist me?

Yes. The following resources are available which may be tailored to your agency's needs.

- OSHA Safety and Health Topics:
 Personal Protective Equipment Overview | Occupational Safety and Health Administration
- NIOSH Directory of Personal Protective Equipment | NIOSH | CDC
- <u>Personal protective equipment: Hazard assessment</u> certification form
- State Risk Management, <u>Job Hazard Assessment Tasks</u> <u>Template</u>
- State Risk Management, <u>Industrial Hygiene Program</u> Element, R2-10-207(10)

For additional assistance, contact State Risk Management, Loss Prevention at rmdlossprevention@azdoa.gov or 602-542-2182.

How do I select PPE?

OSHA 3151-02R 2023, Personal Protective Equipment guidance. A guidance document to help employers and employees understand the types of PPE, know the basics of conducting a "hazard assessment", select appropriate PPE for a variety of circumstances, and understand what kind of training is needed in the proper use and care of PPE.

"All PPE clothing and equipment should be of safe design and construction, and be maintained in a clean and reliable fashion. Employers shall take the fit and comfort of PPE into consideration when selecting appropriate items for their workplace."

"OSHA requires that many categories of PPE meet or be equivalent to standards approved by the American National Standards Institute (ANSI)."

"Employers should inform employees who provide their own PPE of the employer's selection decisions and ensure that any employee-owned PPE used in the workplace conforms to the employer's criteria, based on the hazard assessment, OSHA requirements, and ANSI standards. OSHA requires PPE to meet the following ANSI standards:

- Eye and Face Protection: ANSI Z87.1-2010, ANSI Z87.1-2003, or ANSI Z87.1-1989(R1998).
- Head Protection: ANSI Z89.1-2009, ANSI Z89.1-2003, or ANSI Z89.1-1997.
- Foot Protection: ASTMF-2412-2005 and ASTMF-2413-2005, ANSI Z41-1999, or ANSI Z41.1-1991."

"For hand protection, there is no ANSI standard for gloves but OSHA recommends that selection be based upon the tasks to be performed and the performance and construction characteristics of the glove material."

"The employer should become aware of the different types of PPE available and the levels of protection offered. It is definitely a good idea to select PPE that will provide a level of protection greater than the minimum required to protect employees from hazards."